

## **REMARKS**

Applicant's claims have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Roztocil (GB 2,288,100A) in view of Grossi, et al. ("Grossi", U.S. Pat. No. 5,604,341) and/or Houghton, et al. ("Houghton", U.S. Pat. No. 6,009,153). Each of Applicant's independent claims has been amended through this Response. Accordingly, Applicant submits that the rejections are now moot. Applicant, however, discusses the applied references and their relevance to Applicant's claims in the following.

### **I. The Applied References**

#### **A. The Roztocil Reference**

Roztocil discloses a reproduction apparatus support network. In the Roztocil system, reproduction apparatus 12, such as copiers or printers, include internal computers 14 that monitor and store the functions of the reproduction apparatus. Each internal computer is connected to the support network.

The support network includes a customer assistance center 30 that customers can call, using a standard telephone 90, to talk to an operator that can answer questions about the reproduction apparatus. The telephone is not integrated into the reproduction apparatus.

In addition to the customer assistance center, the support network further includes a separate diagnostic and administrative device 40 that has the ability to collect data from a particular reproduction apparatus, analyze the collected data, and provide "output signals, including signals, sent back to the particular reproduction apparatus, designating alterations necessary for effective operation of such reproduction apparatus."

Roztocil, page 6, line 31 to page 7, line 1.

In view of the above, Applicant notes that Roztocil does **not** state that the functionality of the device 40 is available to an operator of the customer assistance center. Therefore, Roztocil does **not** disclose that an operator can access the reproduction apparatus to view the status or settings of the apparatus while on the line with the customer.

Applicant further notes that Roztocil does **not** state that settings for the reproduction apparatus can be changed remotely, either by the device 40 or by an operator of the customer assistance center. Instead, Roztocil only discloses sending signals “designating alternations.” Roztocil does not explain whether these designations are suggestions that a user can manually input, or otherwise.

**B. The Grossi Reference**

Grossi discloses an ATM that can be used as a video conferencing station. Grossi says nothing about peripheral devices whatsoever. Therefore, Grossi does **not** teach or suggest incorporation of a customer service unit with a peripheral device.

**C. The Houghton Reference**

Houghton discloses facsimile machines and programming methods for those facsimile machines. Contrary to that alleged in the outstanding Office Action, Houghton does **not** teach a facsimile machine that includes a web server module that generates web pages including status or settings information regarding the facsimile machine. For support for the alleged disclosure of that feature, the Office Action identifies column 6, line 36 to column 7, line 5, and column 9 lines 46-67 of the Houghton reference. A review of those portions of the Houghton disclosure reveals that all communication activities are performed by a *configuration server 10* (see Fig. 1), not

by the facsimile machine 40. Furthermore, no mention is made of generation of web pages. The meaning of the term “web page” is plain and unambiguous. Nothing of the sort is disclosed by Houghton.

## **II. Applicant’s Claims**

### **A. Claims 1 and 6**

With reference to independent claim 1, none of the references teach or suggest “receiving a request from a user to contact a customer support representative with a customer support unit integrated with the peripheral device.” Specifically, none of the references teach or suggest a peripheral device that includes such an integral customer support unit.

As to the proffered combination of Grossi to Roztocil to account for an integral customer support unit, Applicant notes, as a first matter, that given that Grossi teaches an ATM that can be used as a video conferencing station, a person having skill in the art would not consider the teachings of Grossi to modify the Roztocil system. Specifically, a person having ordinary skill in the art would not consult ATM inventions for the purpose of modifying Roztocil’s reproduction apparatus. Furthermore, there is no motivation to make the proposed modifications. In particular, neither reference contains a suggestion to combine video conferencing into a reproduction device. It is clear that the only motivation for such a modification comes directly from Applicant’s own disclosure. Such hindsight to Applicant’s own disclosure is clearly improper.

Applicant further notes that neither Roztocil nor Grossi teach or suggest “presenting status and settings information from the peripheral device to the customer service representative while the communications link is active to enable the customer service representative to consult the user as to how the user can correct a problem with

the peripheral device.” Although Roztocil discusses a diagnostic and administrative device 40 that has the ability to collect data from a particular reproduction apparatus, Roztocil does not state that this information is available to a customer support representative, or that the information is available to that representative while the communications link with the customer is active. Therefore, Roztocil fails to teach or suggest the aspect of accessing the peripheral device while the peripheral device user, who is having a problem with the device, is at the device.

With reference to claim 6, neither Roztocil nor Grossi teach or suggest “permitting the customer support representative to change settings of the peripheral device while the communications link is active so that the user can confirm that the problem has been corrected before breaking contact with the customer service representative.” Although Roztocil teaches a diagnostic and administrative device 40 that has the ability to provide “output signals, including signals, sent back to the particular reproduction apparatus, designating alterations necessary for effective operation of such reproduction apparatus,” this does *not* equate to, or render obvious, “permitting the customer support representative to change settings of the peripheral device while the communications link is active” as is required by claim 6.

**B. Claims 15, 17, and 19**

With reference to independent claim 15, none of the applied references, including Houghton, disclose a “*web server module of the peripheral device that is adapted to collect information as to the status and settings of the peripheral device and generate web pages containing the status and setting information*” (emphasis added). See the discussion of the Houghton reference above.

Furthermore, as noted above, none of the references teach or suggest a customer support unit integrated with a peripheral device.

**C. Claim 20**

Regarding claim 20, none of the references disclose “a web server module that is adapted to collect information as to the status and settings of the printer and to generate web pages containing the status and settings information.” See the discussion of claim 15 above.

Furthermore, none of the references disclose a printer that includes a speaker, a display, a microphone, and a video camera.

**D. Claims 21-24**

With regard to independent claim 21, none of the references teach or suggest “receiving a customer support request from a peripheral device user input by the user into the peripheral device”, “establishing a communications link between a customer support representative and the user with a customer support unit that is integrated with the peripheral device in response to the received support request”, “providing configuration information about the peripheral device to the customer support representative while the communications link is active, the information being

provided directly by the peripheral device, “transmitting communications of the customer support representative to the user while the user is at the peripheral device via the customer support unit”, or “transmitting communications of the user to the customer support representative while the user is at the peripheral device via the customer support unit.” Applicant directs the Examiner to the discussions of the other claims provided above.

With reference to dependent claims 23 and 24, none of the references teach or suggest “posting the configuration information to a web page using an embedded web server of the peripheral device” or “permitting the customer support representative to change a setting on the peripheral device remotely.” See the discussions above.

**E. Claims 25-28**

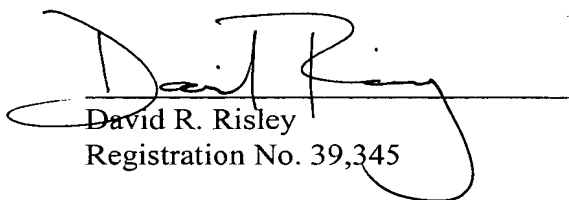
With regard to independent claim 25, none of the references teach or suggest a peripheral device including “an embedded web server configured to collect and post peripheral device configuration information” or “a customer support unit configured to facilitate communications between a peripheral device user at the peripheral device and a customer support representative, the customer support unit including a microphone that collects voice data of the user, a speaker that emits voice data of the representative, and network interface devices that enable transmission of the data between the user and the representative” as is required by claim 25.

Regarding claim 26, none of the references teach or suggest that the embedded web server is “configured to receive remote commands transmitted by the representative to change settings on the peripheral device.”

### CONCLUSION

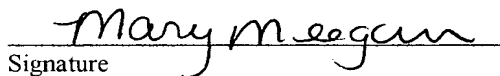
Applicant respectfully submits that pending claims 1, 6, 15, 17, and 19-28 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

  
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11-18-03

  
Signature